

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

JEROME BARROW

Plaintiff,

5

CITY OF CLEVELAND, ET AL.,

Defendants.

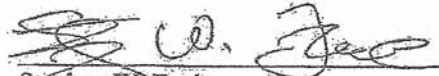
CASE NO. 1:16-CV-00923

JUDGE DONALD C. NUGENT

AFFIDAVIT OF STEPHEN W. FUNK IN SUPPORT OF
DEFENDANTS' MOTION FOR ATTORNEY FEES.

4. The hourly rate of \$300/hour is reasonable and does not exceed the prevailing market rates for the senior attorneys in the Northern District of Ohio who have between eight and fifteen years of experience, such as Michael Pike, Stacey Pellom, and Aikaterini Houston. The hourly rate of \$150/hour is reasonable and does not exceed the prevailing market rates for a first-year attorney, such as Brandon Brown.


Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on this 20th day of February, 2018.


Stephen W. Funk

SIGNED AND SWORN BEFORE ME ON THIS 21st DAY OF FEBRUARY, 2018.



KATHLEEN S. PATONAI, Notary Public
Residence - Summit County
State Wide Jurisdiction, Ohio
My Commission Expires August 3, 2019


Kathleen S. Patonai
Notary Public

AFFIDAVIT OF JON DILENO

1. I, Jon Dileo, a practicing civil attorney at Zashin & Rich for nearly 30 years, have reviewed Defendant's Motion for Attorneys' Fees and Costs in the Matter of Barrow v. City of Cleveland. The hours and rates listed are reasonable given the experience of the attorneys, the breadth of the original complaint, and the amount of Defendants counsel represented.
2. The figures include four attorneys, Aikaterini Houston, Stacey Pellom, Michael Pike, and Brandon Brown. Their fees include work engaging in pleading practice, discovery, trial preparation, multiple motions, and attendance at trial.
3. The inclusion of multiple attorneys was reasonable under the circumstances, given the breadth and depth of the allegations made by Plaintiff in his Complaint. Defendants had to prepare for multiple claims lodged against multiple Defendants, with some allegations in the complaints reaching back into the 1970s.
4. Given the large timeline and multiple Defendants, the total number of hours divided amongst the four Defendants was reasonable.
5. The hourly rate of \$300/hour is reasonable for the Senior Attorneys, Mr. Pike, Ms. Pellom, and Ms. Houston, for civil rights cases. The hourly rate of \$150/hour is reasonable for a new attorney such as Mr. Brown in civil rights cases.

6. FURTHER DECLARANT SAYETH NAUGHT.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 16, 2018.



JON DILENO

NOTARIAL CERTIFICATE

State of Ohio
County of Cuyahoga

The foregoing instrument was acknowledged before me this 2/21/18 (date)

by Robin Imburgia (name of person acknowledged.)


Signature of person taking acknowledgement
Title:



ROBIN IMBURGIA
Notary Public, State of Ohio
My Commission Expires
February 6, 2023